

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED)
STATES VIRGIN ISLANDS)
)
Plaintiff,)
)
v.)
)
JPMORGAN CHASE BANK, N.A.)
)
Defendant/Third-Party Plaintiff.)
_____)
)
JPMORGAN CHASE BANK, N.A.)
)
Third-Party Plaintiff,)
)
v.)
)
JAMES EDWARD STALEY)
)
Third-Party Defendant.)
_____)

Case Number: 1:22-cv-10904-JSR

**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS’
MOTION FOR PARTIAL SUMMARY JUDGMENT**

For the reasons set forth in the accompanying memorandum of law and supporting documents, which are incorporated as if fully set forth herein, the Government of the United States Virgin Islands (“Government”) moves for Partial Summary Judgment. The Government is entitled to judgment as a matter of law for JPMorgan’s participation in Epstein’s sex-trafficking venture and obstruction of enforcement of the law in violation of the Trafficking Victims Protection Act (“TVPA”), 18 U.S.C. §§ 1591(a)(2) and (d). The Government is also entitled to judgment as a matter of law in regard to JPMorgan’s equitable and fault-shifting affirmative defenses (Defenses 5-8).

Accordingly, the Government requests entry of judgment in its favor on Counts I and V of its Second Amended Complaint and requests declaratory relief, injunctive relief, and civil penalties as set forth herein. The Government defers its request for disgorgement, compensatory and punitive damages, and other appropriate relief for JPMorgan's TVPA violations until trial. The Government also requests entry of judgment as to JPMorgan's affirmative defenses 5-8.

Dated: July 24, 2023

ARIEL SMITH, ESQ.
ATTORNEY GENERAL

/s/ Mimi Liu

MIMI LIU

Admitted *Pro Hac Vice*
Motley Rice LLC
401 9th Street NW, Suite 630
Washington, DC 20004
Tel: (202) 232-5504
mliu@motleyrice.com

VENETIA VELAZQUEZ

Admitted *Pro Hac Vice*
Acting Chief, Civil Division
Virgin Islands Department of Justice
Office of the Attorney General
213 Estate La Reine, RR1 Box 6151
Kingshill, St. Croix
U.S. Virgin Islands 00850
Tel: (340) 773-0295 ext. 202481
venetia.velazquez@doj.vi.gov

LINDA SINGER (Admitted *Pro Hac Vice*)

DAVID I. ACKERMAN

PAIGE BOGGS (Admitted *Pro Hac Vice*)

Motley Rice LLC
401 9th Street NW, Suite 630
Washington, DC 20004
Tel: (202) 232-5504
lsinger@motleyrice.com
dackerman@motleyrice.com
pboggs@motleyrice.com

*Attorneys for Plaintiff Government of the
United States Virgin Islands*